

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CITYZENITH HOLDINGS, INC., and)	
MICHAEL JANSEN,)	
)	
Plaintiffs,)	
)	
v.)	22-cv-05101
)	Sara E. Ellis, District Judge
SHANE LIDDELL, and CALEB NAYSMITH,)	Heather McShain, Magistrate Judge
)	
Defendants.)	

MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

Defendant SHANE LIDDELL, by his undersigned counsel, moves the Court to dismiss the Amended Complaint pursuant to Fed.R.Civ.P. 12(b)(2), and in support of his motion states as follows.

1. LIDDELL is the only Defendant remaining in the case.
2. This is a defamation case based on postings to a social media platform.
3. LIDDELL is a foreign national residing outside the United States. He has no connections whatsoever with Illinois.
4. The alleged defamatory statements were not in any way directed at Illinois. LIDDELL did not even know the Plaintiffs were Illinois residents when they were made, and there is no mention of Illinois in them, or associated with them.
5. It is doubtful, based on publicly available data, that the Plaintiffs really even have a business and a business reputation present in Illinois to be damaged.
6. The sole basis alleged for personal jurisdiction is that the “harm” allegedly caused by LIDDELL’s comments must have occurred in Illinois, because the Plaintiffs are in Illinois.

7. As a basis for personal jurisdiction, this is insufficient as a matter of law, under Seventh Circuit and Supreme Court precedent.

8. Therefore, this case must be dismissed. A Brief detailing the basis for this Motion is filed herewith and incorporated by reference herein.

WHEREFORE, Defendant SHANE LIDDELL moves the Court to dismiss the Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2).

SHANE LIDDELL

By: /s/ Marcos Reilly

Dated: February 3, 2023

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